



PATENT  
85CF-00101

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Johnson et al.

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Art Unit: 3624

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Serial No.: 09/737,454

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Examiner: Debra F. Charles

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Filed: December 14, 2000

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For: RAPID VALUATION OF  
PORTFOLIOS OF ASSETS  
SUCH AS FINANCIAL  
INSTRUMENTS

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Respectfully submitted,

Daniel M. Fitzgerald

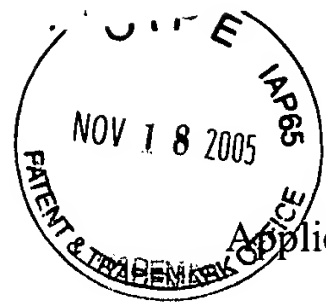
Registration No. 38,880

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**COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313

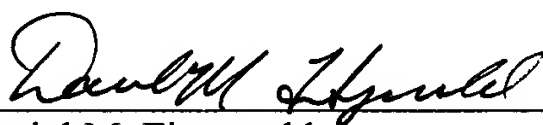
Sir:

The following comments are in response to the Examiner's Statement of Reasons for Allowance in the Notice of Allowability dated October 27, 2005.

Applicants respectfully disagree with the Examiner's Statement of Reasons for Allowance because such statement may have unintentionally introduced some ambiguities in what was otherwise a very concise and thorough examination of the Claims of this patent application. The Examiner recites in the Reasons for Allowance that "each independent claim identifies the uniquely distinct features 'a that includes valuating assets in a portfolio individually by segmenting the portfolio of assets into three valuation portions; fully underwriting each asset included within a first portion of the asset portfolio for computing a value for each asset included within the first portion of the asset portfolio including underwriting in a full cash manner to generate a value table, and underwriting in a partial cash manner to generate a partial value table.'" While Applicants believe that the claims are allowable, Applicants do not acquiesce that patentability resides in these features recited in the Reasons for Allowance. Rather, Applicants respectfully submit that the claims are allowable because the independent claims recite the above-noted recitation in combination with other recitations included in the independent claims.

Also, reasons for allowance are only warranted in instances in which the record of the prosecution as a whole does not make clear the Examiner's reasons for allowing a claim or claims (see 37 CFR §1.104(e)). In the present case, Applicants believe the record as a whole does make the reasons for allowance clear and therefore no statement by the Examiner is necessary or warranted.

Respectfully submitted,



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